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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

VENUS YAMASAKI, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

ZICAM LLC, and MATRIXX
INITIATIVES, INC.,

Defendants.

Case No.: 4:21-cv-02596-HSG

**JOINT STIPULATION FOR
VOLUNTARY DISMISSAL PURSUANT
TO FED. R. CIV. P. 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Venus Yamasaki and Defendants Zicam LLC and Matrixx Initiatives, Inc. (“Defendants”), by and through their respective counsel of record, hereby stipulate and agree to a voluntary dismissal of Plaintiff Yamasaki’s individual claims asserted against Defendants in the above-captioned matter *with prejudice*, and the claims of the putative class asserted against Defendants in the above-captioned matter *without prejudice*. Each party shall bear its own attorney’s fees and costs.

Dated: December 6, 2021

Respectfully submitted,

/s/ Rachel Soffin

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**Pro hac vice* admission
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